## Because field operations don't have to be chaotic



July 6, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary **Federal Communications Commission** 445 Twelfth Street, SW Washington, DC 20554

> Globalstar, Inc. Petition for Notice of Inquiry Regarding the Operation of Re:

Outdoor U-NII-1 Devices in the 5 GHz Band - RM-11808

Dear Ms. Dortch:

Geoforce, Inc. hereby supports Globalstar, Inc.'s ("Globalstar's") above-captioned Petition for Notice of Inquiry.

Geoforce is the largest commercial reseller of Globalstar Simplex satellite services, with an emphasis on commercial and government asset management and logistics. Our products provide tracking and monitoring for over 100,000 assets globally. We also manufacture and sell products that incorporate a proprietary radio transmitter that is certified to operate in Globalstar's licensed spectrum. We comply with all of the FCC Part 25 rules for operation in Globalstar's licensed band and maintain these certifications at substantial cost. We are therefore compliant with FCC rules regarding interference, and respectfully ask the FCC to investigate the interference situation at 5.1 GHz to ensure that Globalstar is receiving the value of its spectrum as licensed and intended.

Geoforce's products depend on Globalstar's spectrum, so we support Globalstar's ongoing efforts to safeguard its full spectrum use. The FCC should expeditiously adopt a Notice of Inquiry on aggregate harmful interference issues in the 5.1 GHz band caused by unlicensed outdoor U-NII-1 operations. Given how the Globalstar system works, an elevated noise level at 5.1 GHz in turn degrades Globalstar's MSS offerings provided to customers in the 2.4 GHz band. The FCC should address this interference and the resulting degradation to Globalstar's MSS system.

Respectfully submitted,

Chief Technology Officer